

From: [Atkins, Blake](#)
To: [Edlund, Carl](#); [Phillips, Pam](#)
Cc: [Coltrain, Katrina](#); [Webster, Susan](#)
Subject: FW: Wilcox Oil--Lead Proposal Support Information
Date: Friday, May 18, 2018 3:07:57 PM
Attachments: [FW Wilcox.msg](#)
[Wilcox Oil Company Lead Consultation.msg](#)
[RE Leveraging Dollars tied to War on Lead.msg](#)

Carl and Pam,
Katrina pulled together the attached documents, based on our previous briefing on a proposed interim action at the Wilcox Oil site. I also had a conversation with Amy Brittain regarding an interim action and the 400 mg/kg vs 800 mg/kg clean up levels, which we can discuss next week.

From: Coltrain, Katrina

Sent: Thursday, May 10, 2018 3:14 PM

To: Atkins, Blake <Atkins.Blake@epa.gov>; Webster, Susan <webster.susan@epa.gov>

Subject: Wilcox Oil--Lead Proposal Support Information

Blake/Susan, during the Proposed Plan briefing, Pam requested some additional information and details related to the decision to address the lead source area to 800 mg/kg. Please find listed below supporting information and documentation related to the request. Please let me know if this meets the questions and the understood expectations.

1. HQ consultation:

- a. A consultation conference call was held on January 25, 2018. An email documenting the discussion and providing support for the proposal was sent to the region by Schatzi Fitz-James, Associate Director Assessment and Remediation Division, on February 9, 2018. Under the initial consultation, the proposal was a limited removal of the lead source area to a target level of 400 mg/kg.
- b. On April 6, 2018, HQ was contacted to further discuss the lead proposal and the requested change to 800 mg/kg per the State's request. An April 9, 2018, response email from Christine Poore, relayed support for the change as long as there was no future residential reuse.

2. State Review

- a. At the current time the property is residential, however, given the uncertainty in the selection of the final remedy, the State requested the use of the 800 mg/kg target for protection of the industrial use scenario.
- b. The State also expressed concern about the difference in volume and cost associated with 400 mg/kg vs 800 mg/kg given the uncertainty in the selection of the final remedy and the potential for returning to the area a second time.

3. Support for the 800 mg/kg lead.

- a. Distinct source of lead is limited in areal extent and removal will eliminate the migration of lead to the adjacent creek.
- b. Using the 800 mg/kg protects for the industrial and site field worker and removes concentration as high as 105,000 mg/kg.
- c. This is specific to the source, will be consistent with the final site-wide remedy, and any residual contamination will be addressed in the final site-wide remedy.
- d. This is not a final remedy, as such only the distinct source will be addressed, and any final remedy related to lead cleanup will be determined by the final risk assessment and site-side ROD.

4. Cost documentation for addressing 400 mg/kg vs 800 mg/kg. The cost for addressing 400 mg/kg is an additional estimated ~\$400,000.
5. Leveraging Lead Dollars/ 'War' on lead: based on a discussion and the response provided (attached above), the Wilcox Proposal does not fit into the specific objectives for the effort.

Lead	Area (ft2)	Volume (y3)	Excavation	Treatment	Treated volume	Disposal	total
800 mg/kg	30633	2269	\$170,255	\$385,176	2450	\$107,805	\$663,236
400 mg/kg	50,698	3755	\$279,812	\$623,921	4053	\$178,218	\$1,081,951

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